

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re: Paul A. Ionadi	:	Case No. 20-22585-GLT
	:	
Debtor	:	
	:	Chapter 13
	:	
NORTHWEST BANK F/K/A	:	
NORTHWEST SAVINGS BANK	:	
	:	
Movant	:	Related to Document 93
	:	
vs.	:	
	:	Hearing Date: 12/14/22
Paul A. Ionadi	:	
	:	
Debtor	:	
	:	
and	:	
	:	
Ronda J. Winnecour, Trustee	:	
	:	
Respondent	:	

TRUSTEE'S RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY  
AS TO PROPERTY LOCATED AT 2513 Acorn Court, Wexford, PA, 15090

Ronda J. Winnecour, Chapter 13 Standing Trustee, respectfully represents the following:

1. Northwest Bank requests relief from stay with regard to property located at 2513 Acorn Court, Wexford, PA, 15090.
2. Movant's states that the balance of the Bank's claim equals \$441,893.10.
3. Debtor's Schedule A lists the value of the property as \$475,000, and Debtor has claimed no exemptions.
4. Pennsylvania Department of Revenue (8-2, secured and priority) also has a lien against the property in the amount of \$4,955.91.
5. The total valuation of liens against the property is \$446,849.01, leaving \$28,150.99 of equity in the property.

6. Movant received a disbursement in the amount of \$5,574.76, on November 23, 2022, and according to the Trustee's records, post-petition payments due Movant are presently less than one full payment in arrears.

7. There is a substantial equity cushion in the property, which should be preserved for the benefit of the estate.

WHEREFORE, the Trustee so reports to the Court.

RONDA J. WINNECOUR,  
CHAPTER 13 TRUSTEE

Date: 11/28/2022

By: /s/ James C. Warmbrodt  
James C. Warmbrodt, PA I.D. 42524  
Attorney for Chapter 13 Trustee  
US Steel Tower, Suite 3250  
600 Grant Street  
Pittsburgh, PA 15219  
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	:	
Respondent	:	

CERTIFICATE OF SERVICE

I hereby certify that on the 28th of November 2022, I served one true and correct copy of the foregoing document on the following parties in interest by United States regular mail, postage prepaid unless otherwise stated, addressed as follows:

Joseph S. Sisca, Esquire  
Assistant U.S. Trustee  
1001 Liberty Avenue, Suite 970  
Pittsburgh, PA 15222

Donald Calaiaro, Esquire  
Calaiaro Valencik  
938 Penn Avenue, Suite 501  
Pittsburgh, PA 15222

Preston D. Jaquish, Esquire  
McGrath McCall, P.C.  
Four Gateway Center, Suite 1040  
444 Liberty Avenue  
Pittsburgh, PA 15222

11/28/2022

Date

/s/ Renee Ward

Administrative Assistant  
Office of the Chapter 13 Trustee  
U.S. Steel Tower – Suite 3250  
600 Grant Street  
Pittsburgh, PA 15219  
(412) 471-5566

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